

September 23, 1998

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SEP 28 1998

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SUBJECT: Comments on the Advanced Mixed Waste Treatment Project

Mr. John Medema:

Thank-you for this opportunity to comment on the AMWTP.

Comments on draft AMWTP DEIS.

Add additional alternative(s)- with RCRA driver rather than only WIPP. It's a mistake for DOE to recommend a *preferred alternative* in which above-ground TRU waste at INEEL, be given a higher priority for treatment and shipments, than the more important task of retrieving and packaging the remaining *buried* TRU waste. This buried waste at INEEL represents a significantly higher risk to the health and environment, particularly through the Snake River Plain Aquifer, than the risks arising from the above-ground inventory, and therefore DOE should re-evaluate the risks appropriately, and add additional alternatives.

It is a major mistake for DOE to make the decision in this DEIS that the retrievable waste has to be treated in order to be sent to WIPP. The WIPP-Waste Acceptance Criteria (WIPP-WAC) should not be the primary driver of the progress toward the cleanup of TRU waste at INEEL. The reason the WIPP-WAC is inappropriate, is that it unnecessarily drives up the costs of treatment. For example, the proposed super-compactor's primary function, apparently, is to blend lower level waste, and ignitable waste, with enough higher level TRU waste to make this low-level waste meet the WIPP-Waste Acceptance Criteria. Otherwise, this waste would not need to be sent to WIPP. DOE is proposing, then, to spend a large amount of tax dollars without purpose, since much of the alpha low-level waste could be treated in accordance with applicable RCRA permitting standards without the expensive and unnecessary process of blending it with higher level waste. Super-compaction, micro-encapsulation and incineration costs a lot of money, and if it is unnecessary to direct alpha-low-level waste through this process then DOE has an obligation to draft another EIS for public comment that includes more cost-effective alternatives for dealing